

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 24-30422
	)	(Chapter 11)
JAMIESON CAPEX FUND, LLC.	)	
	)	
Debtor.	)	
_____	)	

**DECLARATION IN SUPPORT OF  
OPPOSITION TO MOTION TO RECONSIDER ORDER**

1. My name is Maurice VerStandig, I am over the age of eighteen, and I am competent to testify to the matters set forth herein.

2. The Dakota Bankruptcy Firm and I serve as counsel to Brian Kounovsky (“Mr. Kounovsky”) and have so served since prior to September 19, 2024.

3. DBF and I were engaged to represent Jamieson CAPEX Fund, LLC (“CAPEX”) on September 19, 2024 and filed a bankruptcy petition, on behalf of CAPEX, on September 22, 2024.

4. Because DBF and I did not discuss Mr. Kounovsky’s case with CAPEX, and did not discuss CAPEX’s case with Mr. Kounovsky, DBF and I were not aware, at the time of filing the CAPEX bankruptcy or applying to be employed therein, that Mr. Kounovsky was the former president of CAPEX.

5. Because DBF and I did not discuss Mr. Kounovsky’s case with CAPEX, and did not discuss CAPEX’s case with Mr. Kounovsky, DBF and I were not affirmatively aware, at the time of filing the CAPEX bankruptcy or applying to be employed therein, that Mr. Kounovsky owned an interest in JAMCO LLC.

6. Neither DBF nor I have ever served as counsel to JAMCO LLC.

7. Further declarant sayeth naught.

I, Maurice VerStandig, pursuant to Section 1746 of Title 29 of the United States Code, do hereby declare, under the penalty of perjury, that I have personal knowledge of the matters set forth herein and the foregoing are true and correct.

Dated: December 2, 2024

By: /s/ Maurice B. VerStandig  
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